

## **EXHIBIT A-4**



Dilip Jana &lt;janadilip@gmail.com&gt;

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**Case 4:24-cv-00698-SDJ-BD [Jana-Walmart] Request for Discovery Clarification**

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**Morgan.Jones@gtlaw.com** <Morgan.Jones@gtlaw.com>

Wed, Jun 11, 2025 at 4:47 PM

To: janadilip@gmail.com

Cc: Peter.Wahby@gtlaw.com, Holmes.Hampton@gtlaw.com

Dilip — Your letter (which improperly threatened to move to compel if Walmart did not respond within two days) repeatedly references Walmart's "Interrogatory responses," but Walmart objected to your Interrogatories on multiple grounds, and, in light of its objections, did not substantively answer them. A substantive response to Interrogatory No. 1 (which asked who participated in drafting the answers) was not required, as Walmart did not provide "answers" to the Interrogatories in light of its objections. Further, the fact that Walmart submitted Mr. Milbourne's declaration in connection with its renewed Motion for Protective Order has no relation to the objections that Walmart served in response to your Interrogatories.

Your Interrogatories, among other things, lack appropriate context, fail to define terms, require Walmart to speculate, and contain typos, grammatical errors, and argumentative statements. As reflected in Walmart's objections, Walmart cannot substantively answer your Interrogatories as written. Additionally, many of your Interrogatories contain multiple discrete subparts. Walmart is not obligated to answer Interrogatory Nos. 11 – 24 because you exceeded the number of interrogatories permitted by the Federal Rules of Civil Procedure.

Please let us know whether you intend to serve Interrogatories that are amended to address Walmart's objections.

**Morgan Jones**

Associate

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**From:** Dilip Jana <janadilip@gmail.com>**Sent:** Monday, June 9, 2025 11:30 AM**To:** Jones, Morgan (Assoc-DAL-LT) <Morgan.Jones@gtlaw.com>; Wahby, Peter (Shld-Dal-LT) <Peter.Wahby@gtlaw.com>; Hampton, Holmes (Assoc-DAL-LT) <Holmes.Hampton@gtlaw.com>**Subject:** Case 4:24-cv-00698-SDJ-BD [Jana-Walmart] Request for Discovery Clarification

\*EXTERNAL TO GT\*

7/7/25, 12:14 PM

Gmail - Case 4:24-cv-00698-SDJ-BD [Jane: Walmart] Request for Discovery Clarification

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